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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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DEC 23 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:

Amendment of the Commission's
Rules To Incorporate Mobile
Earth Station Out-of-Band
Emission Limits

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RM 9165

REPLY COMMENTS ON PETITION FOR RULEMAKING

AirTouch Satellite Services US, Inc. ("AirTouch"), supports the proposal submitted by the National Telecommunications and Information Administration ("NTIA") to establish certain mobile earth terminal ("MET") out-of-band emissions criteria. AirTouch is the exclusive service provider for the GLOBALSTAR[™] satellite service in the United States. As such, AirTouch filed for blanket MET authorization¹. AirTouch has been closely involved with the complex domestic and international standards development for MET use in the 1610 to 1626.5 MHz band (earth to space). This band is adjacent to the 1559 to 1610 MHz band used for ARNS services such as GPS and GLONASS. Through these domestic and international processes, AirTouch has worked to communicate the specific performance capabilities necessary for our system deployment of Globalstar terminals. Part of this process included, in-band and out-of-band ARNS compatibility. Though technology, and therefore terminal models, are constantly evolving, the fact remains that severe restrictions on out-of band emissions

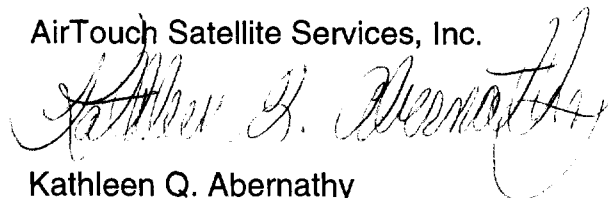
¹ Application of AirTouch Satellite Services US, Inc. for blanket authority to construct and operate up to 500,000 portable handheld earth stations for use with the GLOBALSTAR[™] system, filed with the FCC on July 10, 1997.

below 1610 MHz could drive up MET size and weight and possibly reduce battery talk time. This could ultimately impair system capacity and market acceptance. AirTouch, while not conceding that these levels are necessary to protect GNSS receivers, believes that the NTIA proposal is a delicate compromise that should be supported. This time-phased approach is consistent with the scheduled earliest deployment of GLONASS for use with GNSS. AirTouch further believes that any more stringent out-of-band requirements than those outlined in the September 23, 1997 FCC Public Notice, before the year 2005, could impose severe, unreasonable and unnecessary hardships upon MSS providers at no additional benefit to the ARNS users in the adjacent band. Additionally, AirTouch is also actively working in the international standards bodies to bring their proposed emission limits for CDMA METs into alignment with NTIA's proposal.

Finally, it is AirTouch's understanding that terminals already meeting the wide-band emission level of -70dBW/MHz will be in compliance with the final emission limit and therefore not subject to any constraints resulting from the time phased approach.

Respectfully submitted,

AirTouch Satellite Services, Inc.

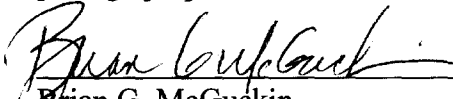
A handwritten signature in dark ink, appearing to read "Kathleen Q. Abernathy", is written over the printed name.

Kathleen Q. Abernathy
Donna L. Bethea

December 23, 1997

CERTIFICATE OF SERVICE

I, Brian McGuckin, hereby certify that a copy of the foregoing reply comments of AirTouch Communications, Inc. was sent by hand or by United States first-class mail, postage prepaid, on this the 23rd day of December, 1997 to the parties on the attached list.



Brian G. McGuckin

December 23, 1997

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